



File Code: 2580

Date: December 4, 2009

Mr. Eddie Terrill  
Director, Air Quality Division  
Oklahoma Department of Environmental Quality  
P. O. Box 1677  
Oklahoma City, OK 73101-1677

Dear Mr. Terrill:

We have reviewed your draft State Implementation Plan (SIP) that the Oklahoma Department of Environmental Quality (ODEQ) submitted on October 5, 2009. We appreciate the effort ODEQ has put into this document. It appears to be a high quality document. However, we have a few concerns, and appreciate the opportunity to comment at this time.

We believe Caney Creek and Upper Buffalo Wildernesses should have been included at the same level of analysis as Wichita Mountains Wilderness (WIMO) as they are impacted by emissions from Oklahoma. The modeled impacts from Best Available Retrofit Technology (BART) sources in Oklahoma (tables VI-10 & VI-11) clearly demonstrate some of Oklahoma's impacts. Caney Creek is less than 17 miles or 27 km from the Oklahoma border. While Upper Buffalo is further away (94 km), it is still being impacted from Oklahoma's emissions and needs to be analyzed in more detail.

We acknowledge that Wichita Mountains is the easternmost Interagency Monitoring of Protected Visibility Environments (IMPROVE) site to be assigned the "Western US" natural conditions estimates. As such, using natural conditions that lie between the revised eastern and western values is probably appropriate. It appears that Uniform Rate of Progress (URP) values are appropriately calculated using the regional haze rule specified values and that the natural conditions estimates do not appear to materially affect control strategies in this SIP. Refining natural conditions estimates in a later SIP revision seems appropriate if new information warrants this.

We do not consider Oklahoma impacts at other Class I areas to be "insignificant". It appears to us in reviewing Table VI-2, that non BART subject sources by themselves maybe having a significant impact.

We believe that Table VIII-10 demonstrates that Oklahoma is doing its share to reduce impacts at WIMO. We believe ODEQ needs to demonstrate that it is doing its share to reduce impacts at Caney Creek and Upper Buffalo Wilderness as well.



Reasonable progress and Best Available Retrofit Technology (BART)<sup>1</sup> evaluations were not adequate. Protocols for BART and voluntary control limits were not well summarized in the main document. Likewise, we believe too little information was presented as to how the four factors (or five for BART) were considered in making control decisions. Additional summary of ODEQ's BART analysis process is needed for us to assess the SIP.

All Class I areas within 300 km should be used in the cost analysis to determine the cost per deciview of visibility improvement. Oklahoma Gas & Electric did not consider all four Class I areas where the Muskogee and Sooner Generating Stations are causing or contributing to visibility impairment.

All Class I areas should be considered as smoke sensitive sites in Oklahoma's Smoke Management Program.

We are providing these comments to ODEQ and ask that they be placed in the official public record. We look forward to your response as per section 40 CFR 51.308(i)(3), and we are willing to work ODEQ staff towards addressing any of the issues discussed in this letter. Again, we appreciate the opportunity to work closely with ODEQ, and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

*/s/ Norman L. Wagoner*  
NORMAN L. WAGONER  
Forest Supervisor  
Ouachita National Forest

*/s/ Judith L. Henry*  
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cc: Lori Nichols  
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<sup>1</sup> BART-eligible sources are those sources that have the potential to emit 250 tons or more of a visibility-impairing air pollutant, were put in place or under construction between August 7, 1962 and August 7, 1977, and whose operations fall within one or more of 26 specifically listed source categories. Under CAA section 169A(b)(2)(A), BART is required for any BART-eligible source which "emits any air pollutant that may reasonably be anticipated to cause or contribute to any impairment of visibility in any such area."

## State Implementation Plan (SIP)

Norman Wagoner  
Richard L Rosemier